



AMERICAN ASSOCIATION OF SMALL RUMINANT PRACTITIONERS

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October 20, 1999

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Dockets Management Branch (HFA-305)
Food and Drug Administration
5630 Fishers Lane
Room 1061
Rockville, MD 20852

Re: New Animal Drug Applications: Sheep as Minor Species (Docket No. 99N-2151)

Dear Sir or Madam:

The American Association of Small Ruminant Practitioners, on behalf of its 1200 members wishes to comment on the proposed rule to reclassify sheep as a minor species for all New Animal Drug Application data collection purposes. Our association is the organized voice for our member veterinarians who deal with sheep, goats, llamas, and farmed deer as part of our professional or personal lives.

The AASRP strongly supports the reclassification of sheep as a minor species for all data collection purposes. Lack of availability of approved, labeled drugs for small ruminants has forced us to extrapolate withdrawal times from cattle drugs. Sheep have a good record of very few violative residues at slaughter which also supports our historical use of cattle data in practice. By changing the classification of sheep for all data collection purposes, hopefully more legal, labeled products for sheep will be available. The FDA should be commended for reopening this issue and accepting some good science that supports the similar drug metabolism and disposition similarities between sheep and cattle.

Currently there is not enough economic incentive for drug companies to have products labeled for sheep. Hopefully this change will allow us to practice in a more efficient manner and with a broader range of drugs. We have no pain medicine available, useful reproduction drugs are unavailable, and antibiotics are a scant few. The FDA should be commended for its acceptance of good science in changing the status of sheep to a minor species without adding any risk to the integrity of our food supply from domestically raised lamb. We urge you to finally take action on this matter. We have resource members that can help answer any questions that may come up.

Sincerely,

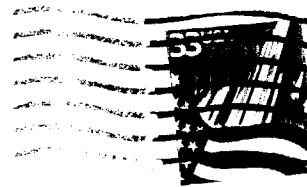

Martin C. Warbington, DVM
President

99N-2151

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Small Ruminant Practitioners**
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